

HOLLAND & HART LLP
9555 HILLWOOD DRIVE, 2ND FLOOR
LAS VEGAS, NV 89134

Robert J. Cassity (9779)
Erica C. Medley (13959)
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: 702.669.4600
Fax: 702.669.4650
bcassity@hollandhart.com
ecmedley@hollandhart.com

Stephen G. Topetzes (*pro hac vice*)
Theodore L. Kornobis (*pro hac vice*)
K&L GATES LLP
1601 K Street, NW
Washington, DC 20006
Tel: (202) 778-9180
Fax: (202) 778-9100
stephen.topetzes@klgates.com
ted.kornobis@klgates.com

*Attorneys for Defendant Christopher Missling and
Nominal Defendant Anavex Life Sciences Corp.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DENISE DEANGELIS, derivatively on behalf
of ANAVEX LIFE SCIENCES CORP.,

Plaintiff,

v.

CHRISTOPHER MISSLING, PETER
DONHAUSER, JIONG MA, ATHANASIOS
SKARPELOS, STEFFEN THOMAS, and
CLAUS VAN DER VELDEN,

Defendants.

and

ANAVEX LIFE SCIENCES CORP.,

Nominal Defendant.

Case No.: 2:24-cv-00891-JCM-MDC

**STIPULATION FOR TEMPORARY
STAY OF PROCEEDINGS**

Plaintiff Denise Deangelis (“Plaintiff”), Defendant Christopher Missling (“Missling”), and
Nominal Defendant Anavex Life Sciences Corp. (“Anavex” or the “Company” and together with

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1 Missling, “Defendants”) (Plaintiff and Defendants, taken together, the “Parties”) hereby stipulate
2 as follows:

3 WHEREAS, on November 27, 2024, the Parties filed a Joint Stipulation to withdraw
4 Anavex’s Countermotion for a briefing schedule, accept service of process for Defendant Missling,
5 and set a deadline for the parties to submit a briefing schedule on a motion to dismiss. *See* ECF
6 No. 22;

7
8 WHEREAS, the Court approved the Joint Stipulation on November 27, 2024, setting a
9 deadline of January 15, 2025 for the parties to submit a proposed stipulation regarding briefing.
10 *See* ECF No. 23;

11 WHEREAS, the Parties have met and conferred regarding the most efficient manner to
12 proceed in this matter given the pendency of a motion to dismiss in a class action pending in the
13 United States District Court for the Southern District of New York, *Huey v. Anavex Life Sciences*
14 *Corporation*, No. 1:24-cv-01910-CM (the “*Huey Action*”); and

15
16 WHEREAS, in an effort to proceed in the most efficient manner, the Parties agree that it
17 would save judicial and party resources to temporarily stay this action in its entirety pending the
18 resolution of defendants’ motion to dismiss in the *Huey Action*.

19 WHEREFORE, the Parties hereby agree, stipulate, and respectfully request that the Court
20 enter an order as follows:

21
22 1. This action is stayed in its entirety (including all discovery) until the resolution of
23 defendants’ motion to dismiss in the *Huey Action*.

24 2. Defendants shall promptly notify Plaintiff of any derivative action filed on behalf
25 of Anavex of which Defendants become aware and that asserts claims substantially the same as
26 those asserted in this action (“Related Derivative Actions”).
27
28

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1 3. Plaintiff has the option to terminate the stay if a Related Derivative Action is not
2 stayed for a similar or longer duration than this action by giving 14 days' notice to counsel for
3 Defendants via email.

4 4. During the stay, Plaintiff may amend the complaint to the extent otherwise
5 permitted by the Federal Rules of Civil Procedure, but Defendants shall not be required to respond
6 to any amended complaint during the pendency of the stay.

7 5. The Parties will submit a stipulation to this Court regarding the briefing schedule
8 for a motion to dismiss within 30 days of the court's decision on defendants' pending motion to
9 dismiss in the *Huey* action or upon termination of the stay as provided above.

10 **IT IS SO STIPULATED.**

11 Dated: January 15, 2025

12 **HOLLAND & HART LLP**

13 /s/ Robert J. Cassity

14 Robert J. Cassity

15 Erica C. Medley

16 9555 Hillwood Drive, 2nd Floor

17 Las Vegas, NV 89134

18 **K&L GATES LLP**

19 Stephen G. Topetzes

20 Theodore L. Kornobis

21 1601 K Street, NW

22 Washington, DC 20006

23 *Attorneys for Defendant Christopher Missling and*
24 *Nominal Defendant Anavex Life Sciences Corp.*

25 Dated: January 15, 2025

26 **LEVERTY & ASSOCIATES LAW CHTD.**

27 /s/ Patrick R. Leverty

28 Patrick R. Leverty

 Reno Gould House

 832 Willow Street

HOLLAND & HART LLP
9555 HILLWOOD DRIVE, 2ND FLOOR
LAS VEGAS, NV 89134

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Reno, NV 89502
Tel. 775.322.6636
Fax. 775.322.3953
Email: pat@levertylaw.com

THE BROWN LAW FIRM, P.C.
Timothy Brown
767 Third Avenue, Suite 2501
New York, NY 10017
Telephone: 516.922.5427
Facsimile: 516.344.6204
Email: tbrown@thebrownlawfirm.net

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: _____

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